

P. Warren Hunt (P69713) (Admitted Pro Hac Vice)  
Kerr, Russell and Weber, PLC  
500 Woodward Avenue, Suite 2500  
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(313) 961-0200  
pwh@krwlaw.com  
*Counsel for Reliable Carriers, Inc.*

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

In re:	)	CHAPTER 11
	)	
MOTORS LIQUIDATION COMPANY,	)	Case No: 09-50026
	)	(Jointly Administered)
	)	
Debtors.	)	Honorable Robert E. Gerber
	)	

**MOTION TO WITHDRAW AS COUNSEL OF RECORD**  
**FOR CREDITOR RELIABLE CARRIERS, INC.**

P. Warren Hunt of Kerr, Russell and Weber, PLC, former counsel of record for creditor Reliable Carriers, Inc. ("Reliable"), for his Motion to Withdraw as counsel, states:

1. On June 10, 2009, P. Warren Hunt filed his Application for Pro Hac Vice Admission (Docket No. 575) as counsel for Reliable.
2. P. Warren Hunt of Kerr, Russell and Weber, PLC no longer represents Reliable in this case.
3. Reliable will not be prejudiced by the withdrawal of P. Warren Hunt.
4. The parties to this action will not be prejudiced by the withdrawal of P. Warren Hunt.
5. A proposed order granting withdrawal is attached as Exhibit A.

WHEREFORE, P. Warren Hunt requests that this Court (1) enter an Order Approving P. Warren Hunt's Motion to Withdraw as Counsel of Record for Creditor Reliable Carriers, Inc.

without requiring a hearing; and (2) remove P. Warren Hunt, whose email address is: pwh@krwlaw.com, from the mailing matrix and from receiving electronic filings in this case.

Dated: November 22, 2013

By: /s/P. Warren Hunt  
P. Warren Hunt (P69713)  
Kerr, Russell and Weber, PLC  
500 Woodward Avenue, Suite 2500  
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# EXHIBIT A

P. Warren Hunt (P69713) (Admitted Pro Hac Vice)  
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*Counsel for Reliable Carriers, Inc.*

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**ORDER APPROVING WITHDRAWAL AS COUNSEL**  
**FOR CREDITOR RELIABLE CARRIERS, INC.**

This matter having come before the Court by the filing of P. Warren Hunt's Motion to Withdraw as Counsel of Record for the Creditor Reliable Carriers, Inc. ("Reliable ") and the Court being otherwise fully advised in the premises:

IT IS HEREBY ORDERED THAT:

P. Warren Hunt of Kerr, Russell and Weber, PLC, is hereby withdrawn and discharged as counsel for Reliable in this case.

IT IS FURTHER ORDERED THAT:

P. Warren Hunt, whose email address is: pwh@krwlaw.com, is removed from the mailing matrix and from receiving electronic filings in this case.

P. Warren Hunt (P69713) (Admitted Pro Hac Vice)  
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*Counsel for Reliable Carriers, Inc.*

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MOTORS LIQUIDATION COMPANY,	)	Case No: 09-50026
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	)	

**CERTIFICATE OF SERVICE**

I hereby certify that on November 22, 2013, I electronically filed the foregoing Motion to Withdraw as Counsel of Record with the Clerk of the Court using the ECF system which will send notification of such filing to all ECF Participants in connection with this matter.

Dated: November 22, 2013

By: /s/P. Warren Hunt  
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